

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)		
)	Chapter:	7
Eddy & Sons Towing Corp.)		
)	Case No:	21-11161
)		
Debtors.)	Judge:	Janet S. Baer

NOTICE OF TRUSTEE'S MOTION TO EMPLOY ATTORNEYS

To: See attached Service List.

PLEASE TAKE NOTICE THAT ON **April 1, 2022 at 11:00 a.m.**, I will appear telephonically before the **Honorable Judge Janet S. Baer**, or any Judge sitting in her place, and present the attached *Trustee's Motion to Employ Attorneys*, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard by video link or telephonically on the motion, you must do the following information:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at **1-669-254-5252** or **1-646-828-7666**. Then enter the meeting ID and password.

Meeting ID and password. The **meeting ID** for this hearing is **160 731 2971** and the password is **587656**. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ Thomas E. Springer
Attorney for Trustee

Thomas E. Springer
Springer Larsen Greene, LLC
300 S. County Farm Road, Suite G
Wheaton, IL 60187
630-510-0000

CERTIFICATE OF SERVICE

I, Thomas E. Springer, an attorney, on oath state that I caused to be served this Notice, Motion and proposed Order by mailing and/or electronically serving where available a copy to all parties entitled to receipt of notice through the Court Electronic Case Filing system and depositing same in the U.S. Mail at 300 S. County Farm Road, Illinois before 5:45 p.m. on **March 16, 2022** with proper postage prepaid.

/s/ Thomas E. Springer /s/

SERVICE LIST

ECF Service:

Patrick S. Layng, Esq.
United States Trustee
219 South Dearborn Street
8th Floor
Chicago, IL 60604
USTPRegion11.ES.ECF@usdoj.gov

David H Cutler
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
847-673-8600
Email: cutlerfilings@gmail.com

US Mail

Eddy & Sons Towing Corp.
1427 Fifth Ave
Aurora, IL 60504

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TRUSTEE’S APPLICATION FOR AUTHORITY TO EMPLOY ATTORNEYS

NOW COMES the Trustee, THOMAS E. SPRINGER (herein “Trustee”), and moves this Court pursuant to 11 U.S.C. §327(a) and Federal Rule of Bankruptcy Procedure (FRBP) 2014 for the entry of an Order authorizing the employment of Thomas E. Springer and the law firm of SPRINGER LARSEN GREENE, LLC, as his attorneys. In support of this Motion, Trustee respectfully states to this Court as follows:

1. On September 29, 2021 the Debtor filed its petition for relief under Chapter 7 of the United States Bankruptcy Code (the “Code”) under 11 U.S.C. §101 et. seq.
2. Trustee Thomas E. Springer was appointed as Trustee and concluded the Creditor Meeting pursuant to section 341 of the Code. Subsequently, Trustee issued a finding of assets.
3. Pursuant to 11 U.S.C. §327, the Trustee may employ one or more attorneys to assist in the administration of the Bankruptcy Estate.
4. Trustee wishes to employ Thomas E. Springer, and the law firm of SPRINGER LARSEN GREENE, LLC, to act as Trustee’s counsel in these proceedings.
5. As evidenced by the attached Affidavit, Thomas E. Springer and the law firm SPRINGER LARSEN GREENE, LLC, have no connection with any creditor or any other party in interest, their respective attorneys and accountants, the United States Trustee or any person

employed in the office of the United States Trustee, or any other known party related to this bankruptcy estate or these proceedings except where indicated on the supporting Affidavits.

6. Thomas E. Springer and the law firm SPRINGER LARSEN GREENE, LLC, d/b/a, are disinterested parties to this proceeding and do not hold or represent any interest adverse to this estate.

7. Thomas E. Springer and the law firm SPRINGER LARSEN GREENE, LLC, have considerable experience in bankruptcy and bankruptcy related matters and are well qualified to represent the trustee in this case. Accordingly, SPRINGER LARSEN GREENE, LLC, will render professional services to the Trustee as follows:

a. to advise and consult with the Trustee regarding the assets of the Debtor and how to pursue those assets;

b. to prepare the necessary applications, complaints, answers, orders, reports, related pleadings and other legal papers and to appear before the Court regarding such matters as well as to prepare the necessary orders relative to those matters;

c. to prepare, file and prosecute any and all actions to recover property of the estate and to perform all necessary functions related to execution of this Court's Orders;

d. to perform any and all legal services that may be required from time to time during the administration of the estate herein.

8. Any compensation paid to SPRINGER LARSEN GREENE, LLC, shall be subject to prior approval of this Court, pursuant to appropriate application, notice and hearing. At the time of the filing of this Application and Motion, the hourly rates for the respective attorneys in the applicant Law Firm are as follows:

Thomas E. Springer	\$465/hr.
Richard G. Larsen	\$455/hr.
Michele M. Springer	\$455/hr.
Joshua D. Greene	\$455/hr.
John H. Squires	\$500/hr.

9. The above listed hourly rates are current as of the filing of this Motion seeking approval of employment by the Trustee. Any change to the referenced hourly rates or attorneys added to the Law Firm subsequent to this motion pursuant to FRBP 2014(b) shall be accordingly delineated and listed in any subsequent Motion seeking approval of compensation before the Court.

WHEREFORE, for the foregoing reasons, Trustee Thomas E. Springer prays for the entry of an Order authorizing him to employ Thomas E. Springer and the law firm of SPRINGER LARSEN GREENE, LLC, as counsel to the Trustee, and for such other and further relief as this Court deems just and equitable.

Respectfully Submitted,
Thomas E. Springer, Trustee

By: /s/Thomas E. Springer /s/
One of His Attorneys

Thomas E. Springer
Springer Larsen Greene, LLC
Wheaton Office Center
300 S. County Farm Road, Ste. G
Wheaton, IL 60187
(630) 510-0000
tspringer@springerbrown.com